

REMARKS/ARGUMENTS

The applicants have studied the office action mailed October 30, 2008, and believe the application is in condition for allowance. Reconsideration and reexamination are respectfully requested.

Although Applicants previously amended and cancelled claims, Applicants are not conceding in this application that the claims in their pre-amended form are invalid for being unpatentable, as the present claim amendments and cancellations are for facilitating expeditious prosecution. Applicants respectfully reserve the right to pursue these and other claims in this present application and one or more continuations and/or divisional patent applications.

Claims 30, 31, 40, 41, 50-53 and 55 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Arend et al ("Arend" 20030229848 A1) in view of Aureglia et al ("Aureglia" 200301 88257 A1) and Mandrakesoft (Copyright 2003). . Claims 32-39, 42-49 and 54 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Arend et al ("Arend" 20030229848 A1) and Aureglia et al ("Aureglia" 20030188257 A1 and Mandrakesoft (Copyright 2003) and further in view of Luque (2004/0119749 A1). These rejections are respectfully traversed.

For example, claim 30 is directed to operations comprising "presenting to a user a display having a view configuration widget providing a graphical interface object having a matrix of rows and columns of selectable elements representing a corresponding matrix of preconfigured filters including a preconfigured column filter associated with each column of selectable elements for filtering columns of a table for display according to predetermined criteria and a preconfigured row filter associated with each row of selectable elements for filtering rows of said table for display according to predetermined criteria; accepting user input to select a selectable element of said matrix of rows and columns of selectable elements to implement a combination filter associated with the selectable element selected by the user to display a preset configuration of rows and columns of the table wherein said combination filter is a combination of the row filter and the column filter associated with the selected element; and presenting a display of the preset configuration of rows and columns to the user."

The Examiner has conceded that the Arend reference fails to teach or suggest preconfigured column filters. Moreover, the filter buttons 240, 242 appear to be arranged in a single filter row 238. Accordingly, it is clear that the filter row 238 cited by the Examiner fails

to provide “a graphical interface object having a matrix of rows and columns of selectable elements representing a corresponding matrix of preconfigured filters including a preconfigured column filter associated with each column of selectable elements for filtering columns of a table for display according to predetermined criteria and a preconfigured row filter associated with each row of selectable elements for filtering rows of said table for display according to predetermined criteria” as required by claim 30.

The Examiner has cited the MandrakeSoft reference as showing a matrix of buttons and the Luque reference as showing a drop down menu. In the MandrakeSoft reference, it appears that selecting a button of the matrix of buttons selects a particular desktop. However, the Examiner has cited no relationship between the various desktops and the matrix arrangement of the buttons. For example, the Examiner has cited no portion of the MandrakeSoft reference which teaches or suggests that selecting a particular button selects a desktop having a *combination* features, some features being associated with the column in which the button is located and other features being associated with the row in which the button is located. Instead, the position of each button within the MandrakeSoft matrix appears to be totally arbitrary, such that the function assigned to the button bears no relationship to the column or row in which the button is found.

Accordingly, even if the filter buttons of the Arend reference were arranged in a matrix similar to the button matrix depicted in the MandrakeSoft reference, in the manner suggested by the Examiner, a point not conceded by the present applicants, it is respectfully submitted that that the Examiner has cited no portion of the references which teaches or suggest that a single particular button of the Arend reference can implement a *combination* of two different types of filters as established above. Accordingly, it is clear that accepting user input of one button of a set of buttons modified to be in a matrix as suggested by the Examiner would still clearly lack “accepting user input to select a selectable element of said matrix of rows and columns of selectable elements to implement a combination filter associated with the selectable element selected by the user to display a preset configuration of rows and columns of the table wherein said combination filter is a combination of the row filter and the column filter associated with the selected element ...” as required by claim 30. The Examiner’s citations to the Luque reference are similarly deficient.

It is respectfully submitted that the Examiner's citations to the Aureglia reference are similarly deficient. Thus, the page identifier tabs 261a-263a of FIG. 2C, for example, appear to be arranged in a single row. Similarly, the page identifier tabs 261b-263b of FIG. 2D, for example, appear to be arranged in a single row. Likewise, the horizontal display level fields 1614 of the input box 1615 of FIG. 16 appear to be arranged in a single column. Similarly, the vertical display level fields 1606 of the input box 1605 appear to be arranged in a single column which is separate from the input box 1615. Accordingly, it is clear that the tabs or fields cited by the Examiner fail to provide "a graphical interface object having a matrix of rows and columns of selectable elements representing a corresponding matrix of preconfigured filters including a preconfigured column filter associated with each column of selectable elements for filtering columns of a table for display according to predetermined criteria and a preconfigured row filter associated with each row of selectable elements for filtering rows of said table for display according to predetermined criteria" as required by claim 30.

Claim 30 further requires "accepting user input to select a selectable element of said matrix of rows and columns of selectable elements to implement a combination filter associated with the selectable element selected by the user to display a preset configuration of rows and columns of the table wherein said combination filter is a combination of the row filter and the column filter associated with the selected element ..." Thus, a user may select a single "selectable element of said matrix of rows and columns of selectable elements" in order to "implement a combination filter associated with the selectable element selected by the user to display a preset configuration of rows and columns of the table wherein said combination filter is a combination of the row filter and the column filter associated with the selected element ..."

Not only is it clear that the tabs or fields cited by the Examiner fail to provide "a graphical interface object having a matrix of rows and columns of selectable elements representing a corresponding matrix of preconfigured filters including a preconfigured column filter associated with each column of selectable elements for filtering columns of a table for display according to predetermined criteria and a preconfigured row filter associated with each row of selectable elements for filtering rows of said table for display according to predetermined criteria" as required by claim 30, it is also respectfully submitted that the Examiner has cited no portion of the Aureglia reference which teaches or suggest that a single particular tab or field of the elements of the Aureglia reference can "implement a combination filter associated with the

selectable element selected by the user to display a preset configuration of rows and columns of the table wherein said combination filter is a combination of the row filter and the column filter associated with the selected element ...” as required by claim 30. On the contrary, it appears that each individual horizontal display level field 1614 of the input box 1615 of FIG. 16 is associated with only one horizontal display level. Similarly, it appears that each individual vertical display level field 1606 of the input box 1605 is associated with only one vertical display level. Thus, to implement a combination, *both* an individual horizontal display level field 1614 of the input box 1615 *and* an individual vertical display level field 1606 of the input box 1605 must be selected. It is respectfully submitted that the Examiner has cited no portion of the Aureglia reference which teaches or suggest that a single particular tab or field of the elements of the Aureglia reference can implement a *combination* of both a horizontal display level and a vertical display level as those terms are described in the Argali reference.

As noted above, the Examiner has cited the MandrakeSoft reference as showing a matrix of buttons and the Luque reference as showing a drop down menu. In the MandrakeSoft reference, it appears that selecting a button of the matrix of buttons selects a particular desktop. However, the Examiner has cited no relationship between the various desktops and the matrix arrangement of the buttons. For example, the Examiner has cited no portion of the MandrakeSoft reference which teaches or suggests that selecting a particular button selects a desktop having a *combination* features, some features being associated with the column in which the button is located and other features being associated with the row in which the button is located.

Accordingly, even if the Arend and Aureglia reference were combined in the manner suggested by the Examiner to provide combination filters, a point not conceded, and even if the fields or tabs of the Argali reference or the buttons of the Arend reference were arranged in a matrix similar to that depicted in the MandrakeSoft reference in the manner suggested by the Examiner, a point not conceded by the present applicants, it is respectfully submitted that that the Examiner has cited no portion of the references which teaches or suggest that a single particular tab or field or button of the elements of the Aureglia or the Arend reference can implement a *combination* of both a horizontal display level and a vertical display level as established above. Accordingly, it is clear that accepting user input of one button or one tab or one field of a set of buttons or tabs or fields modified to be in a matrix as suggested by the Examiner would still

clearly lack “accepting user input to select a selectable element of said matrix of rows and columns of selectable elements to implement a combination filter associated with the selectable element selected by the user to display a preset configuration of rows and columns of the table wherein said combination filter is a combination of the row filter and the column filter associated with the selected element ...” as required by claim 30. The Examiner’s citations to the Luque reference are similarly deficient.

Still further, it would not be obvious to modify the method of the Arend or Aureglia reference in view of the MandrakeSoft reference to provide for a single particular tab or field or button of the elements of the Aureglia or the Arend reference to implement a *combination* of both a horizontal filter and a vertical filter depending upon the row and column position of the element in a matrix since the Examiner has not even cited any relationship between the various desktops and the matrix arrangement of the buttons in the MandrakeSoft reference. For example, the Examiner has cited no portion of the MandrakeSoft reference which teaches or suggests that selecting a particular button selects a desktop having a *combination* features, some features being associated with the column in which the button is located and other features being associated with the row in which the button is located. *Clearly, the Examiner is engaged in impermissible hindsight, modifying the references in a manner not in any way taught, suggested or motivated by the references, considered alone or in combination.*

Accordingly, it is respectfully submitted that the deficiencies of the Examiner’s citations to the Arend and Aureglia references are not met by the Examiner’s citations to the MandrakeSoft and Luque references.

Independent claims 40, and 50 may be distinguished in a similar fashion.

The rejection of the dependent claims is improper for the reasons given above. Moreover, the dependent claims include additional limitations, which in combination with the base and intervening claims from which they depend provide still further grounds of patentability over the cited art.

The Examiner has made various comments concerning the anticipation or obviousness of certain features of the present inventions. Applicants respectfully disagree. Applicants have addressed those comments directly hereinabove or the Examiner’s comments are deemed moot in view of the above response.

Conclusion

For all the above reasons, Applicant submits that the pending claims are patentable. Should any additional fees be required beyond those paid, please charge Deposit Account No. 09-0466.

The attorney of record invites the Examiner to contact him at (310) 553-7970 if the Examiner believes such contact would advance the prosecution of the case.

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